

## **CC Docket No. 94-102 – January 2004 E911 Interim Report**

**Filed by:** Tennessee Cellular Telephone Co.

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**Date:** January 15, 2004

**To:** Marlene H. Dortch, Secretary  
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### **By Electronic Submission:**

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**TIER III CARRIER INTERIM REPORT  
AS OF JANUARY, 2004  
CC Docket No. 94-102**

Tennessee Cellular Telephone Co. ("TCTC") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), *Public Notice*, DA 03-2113, released June 30, 2003, and *Order to Stay*, FCC 03-241, released October 10, 2003.

**Carrier Identifying Information:**

**Carrier Name:** Tennessee Cellular Telephone Co. – FRN 0005-9386-59

**E911 Compliance Officer:** John D. Champagne  
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**E911 Implementation Information:**

TCTC is operating as a "carriers' carrier", providing only wholesale service to other carriers. Thus, TCTC has no subscribers and will not have any subscribers. Based on this premise, TCTC hereby reports as follows:

- ☐ TCTC still has not received any Phase I or Phase II E911 requests from PSAPs. TCTC has installed all of the equipment and software necessary to meet any Phase I request from a PSAP. Additionally, TCTC has retained the services of Intrado, Inc., as a consultant to assist it in contacting and working with any PSAP in its market that may request Phase I E911. Intrado is one of the most respected names in the E911 industry. Most of its personnel have over twenty years of experience working for PSAPs or in the PSAP field. TCTC is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and will have to work with the local exchange carrier ("LEC") to have a landline installed when the time comes. TCTC's system operates in rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Thus, there is the substantial possibility that a PSAP's request would remain outstanding longer than six months while TCTC awaits the installation of a landline connection to the PSAP. Notably, because TCTC has no subscribers, TCTC does not have the means to fund any Phase I implementation and recurring costs via subscriber pass-throughs.
- ☐ TCTC elected a handset-based solution. TCTC is using analog and TDMA technology, and is considering migration to GSM technology.
- ☐ TCTC has installed all of the necessary switch hardware and software for Phase I E911 deployment. TCTC still anticipates a significant problem with its Phase II E911 deployment.

There is currently no Phase II-compliant handset-based solution available for either TDMA or GSM, and it appears that one will not become available any time in the near future. Moreover, TCTC remains unable to switch to a network-based solution, because it is technically impossible. The only Phase II-compliant network-based solutions available are based on either triangulation techniques, which can work only when the network is receiving location information on the involved mobile unit from three different cell sites, or angle of arrival techniques (“AOA”), which can work only when the network is receiving location information from at least two different cell sites.

TCTC operates only in a remote, rural area. TCTC is operating a single cell and, thus, TCTC’s service area is not susceptible to either triangulation or AOA techniques. Therefore, TCTC is not able to implement Phase II E911, and even if it did it would never be able to reach the required 95% accuracy level on a system-wide basis, as prescribed by §20.18 of the Commission’s rules.

- ☐ TCTC obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. TCTC did not encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. TCTC added no new subscribers after October 1, 2002. As previously discussed, TCTC is now operating entirely as a “carriers’ carrier”. TCTC currently has no subscribers, but, rather, serves only the customers of other carriers. TCTC will not have any future subscribers.
- ☐ TCTC does not anticipate that full Phase II service will ever be available in its network, for the reasons discussed above pertaining to the issues with the absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond TCTC’s control. Even if TCTC were to migrate to GSM technology, there is currently no GSM handset-based technology available, and vendor predictions of future development are unreliable. TCTC has a request pending with the Commission for a permanent waiver of the Phase II requirements.
- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.